

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE AT NASHVILLE

COREY TAYLOR,
Plaintiff,

vs.

TRINITY SERVICE GROUP,
Defendants.

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US DISTRICT COURT
MID DIST TENN

Case No.: 3:22-cv-00920

JUDGE: CAMPBELL

MAGISTRATE JUDGE: NEWBERN

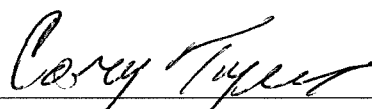
**PLAINTIFF'S PETITION FOR LEAVE TO FILE MOTION
FOR EXTENSION OF TIME TO COMPLETE DISCOVERY**

Come Now, Corey Taylor seeking to respectfully move this court to grant him permission for leave to be granted an extension of time to complete discovery in this matter as the court has set the scheduling order (Doc.No. 35) and has stipulated that discovery is to be completed by July 25, 2024. Plaintiff will show that good cause exist for the extension of time to complete discovery. plaintiff is seeking a 30-Day extension which extend to August 25, 2024. plaintiff seeks this extension due to being served on July 24,2024. with a new notice of appearance that was served upon him by an unknown counsel that has identified himself as Sean C. Wlodarczyk of Evans, Jones and Reynolds, PC., whom identifies as a professional corporation attorneys at law located 401 Commerce Street, Suite 710, Nashville, TN 37219-2405. (See Ex.A. & Attachment of envelop). plaintiff has been unnecessarily delayed by these acts committed by defendant and has had to file a motion of objection to this late notice of appeal and plaintiff is also preparing for his Post-conviction hearing in Davidson County Criminal Court which is on August 8th, 2024. (See

Davidson County Court Record Case No. 2022-C-1359). plaintiff is seeking this extension for good cause and plaintiff was just served with a court hearing out of Illinois regarding his minor child (see IL Juvenile Court Records Case No. 2024JA00504). and is set for another hearing on August 7th, 2024. plaintiff does have good cause for this request for extension of time and prays that this court grant him an extension as good cause does exist and due to plaintiff already being engaged in discovery with defendant and is awaiting for defendant response to plaintiff's request for discovery.

WHEREFORE, plaintiff prays that this court will grant him an extension of time from July 25, 2024 to August 25, 2024 for both completion of discovery and discovery motions that may be filed by plaintiff seeking to compel discovery if defendant is failing to comply with discovery request served on them.

Respectfully submitted,

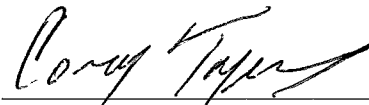
A handwritten signature in cursive script, appearing to read "Corey Turner", is written over a horizontal line.

TDOC, 534419
TURNER CNTR. INDUS. COMPLEX
1499 R.W. MOORE MEMORIAL HWY
ONLY, TN 37140

CERTIFICATE OF SERVICE

This is to certify that on this 24th day of July, 2024. a true and accurate copy of the foregoing was placed in the institutional inmate mail box to be delivered via U.S. Mail to the U.S. Dist. Ct. M.D. Tenn. Clerk of Court to be filed and received via CM/ECF by all parties involved and relief granted as this court deems fair, accurate and just.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Corey Taylor", is written over a horizontal line.

TDOC,534419
TURNER CNTR.INDUS.COMPLEX
1499 R.W. MOORE MEMORIAL HWY
ONLY, TN 37140

Corey Taylor 334419
FCIX-main
499 R.W. Moore Memorial Hwy
3014, TN 37140

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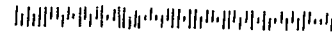
JUL 29 2024

TURNER CENTER MAILROOM
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TO: UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT FOR TN
ATTN: CLERK OF COURT
719 CHURCH ST.
NASHVILLE, TN 37203

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